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9 Attorneys for Defendants
HSBC MORTGAGE CORPORATION (USA)
10 AND HSBC BANK USA, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

15 Philip Wong, Frederic Chaussy, and Leslie
16 Marie Shearn, individually, on behalf of all
others similarly situated, and on behalf of
the general public,

17 | Plaintiffs,

18 |

v.

19 HSBC Mortgage Corporation (USA);
HSBC Bank USA, N.A.; and DOES 1
20 through 50, inclusive.

21 Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF JEANETTE
JENNINGS IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE TO
AMEND FIRST AMENDED COMPLAINT**

Date: August 22, 2008
Time: 9:00 a.m.
Courtroom: 7 (19th Floor)
Judge: Hon. Maxine M. Chesney

Complaint filed: May 7, 2007
FAC filed: June 29, 2007
Trial Date: Not Yet Set

1 1. Jeanette Jennings, hereby declare and state:

2 1. I have personal knowledge of the facts set forth below. If called as a witness,
3 I could and would testify to the following:

4 2. I am employed by HSBC Bank USA, N.A. (hereinafter "HBUS"). My
5 corporate title is "Senior Vice President." My functional job title is "Group Director for Human
6 Resources." In my job, I supervise a group of Human Resources professionals. I, along with the
7 individuals I supervise, provide Human Resources services for HSBC Mortgage Corporation (USA)
8 (hereinafter "HMCU").

9 3. It is HMCU's practice, in conjunction with assistance from the Human
10 Resources group providing Human Resources services for HMCU, to provide all individuals
11 participating in an HMCU sales incentive plan with a copy of that incentive plan. For example, I am
12 aware that Plaintiffs Wong and Chaussy received copies of incentive plans applicable to their jobs.

13 4. The Human Resources professionals that I supervise have responsibility for
14 inputting personnel related information and/or processing instructions related to personnel changes
15 during or at the end of an individual's employment with HMCU. Much of the personnel information
16 that is maintained for these individuals is kept in our PeopleSoft system. I have reviewed the
17 PeopleSoft records for proposed named plaintiff Karen Flanagan. The records reflect that
18 Ms. Flanagan's employment with HMCU ended on March 30, 2007.

19 I declare under penalty of perjury under the laws of the States of California and New
20 York and the United States of America that the foregoing declaration is true and correct to the best
21 of my personal knowledge. Executed this 6 day of August 2008, in Depew, New York.

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JEANETTE JENNINGS

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